COUNTY OF RIVERS OF

County of Riverside DEPARTMENT OF ENVIRONMENTAL HEALTH

P.O. BOX 7909 ● RIVERSIDE, CA 92513-7909 STEVE VAN STOCKUM, DIRECTOR

Date: November 13, 2018

System No. 3301380

Pueblo Unido CDC Attn: Sergio Carranza 78150 Calle Tampico, Ste #214 La Quinta, CA 92253

COMPLIANCE ORDER NO. 05_63_18R_004 ARSENIC MAXIMUM CONTAMINANT LEVEL VIOLATION

Enclosed is Compliance Order No. 05_63_18R_004 issued to Pueblo Unido CDC regarding the Saint Anthony Trailer Park, public water system. Please note there are legally enforceable deadlines associated with this Order.

Any person who is aggrieved by a Compliance Order issued by the Riverside County LPA may file a petition with the State Water Resources Control Board (State Water Board) for reconsideration of the Compliance Order. Petitions must be received by the State Water Board within 30 calendar days of the issuance of the Compliance Order. The date of issuance is the date when the Riverside County LPA mails or serves a copy of the Compliance Order, whichever occurs first. If the 30th day falls on a Saturday, Sunday, or state holiday, the petition is due the following business day. Petitions must be received by 5:00 p.m. Information regarding filing petitions may be found at:

http://www.waterboards.ca.gov/drinking water/programs/petitions/index.shtml

If you have any questions regarding this matter, please contact me at (760) 863-7570.

Sincerely,

Mark Abbott

Supervising Environmental Health Specialist

MARK Abholt

1		RIVERSIDE COUNTY
2		DEPARTMENT OF ENVIRONMENTAL HEALTH
3		
4		
5	То:	Pueblo Unido CDC
6		78150 Calle Tampico
7		La Quinta, CA 92253
8		
9	Attn:	Sergio Carranza
10		
11		
12		COMPLIANCE ORDER NO. 05_63_18R_004
13		FOR
14	VIOLA	TION OF HEALTH AND SAFETY CODE SECTION 116555 (a) (1)
15	AND	THE PRIMARY DRINKING WATER STANDARD FOR ARSENIC
16		WATER SYSTEM NO. 3301380
17		Issued on November 13, 2018
18		
19	The Departm	nent of Environmental Health (hereinafter "Department"), hereby issues
20	this Complia	nce Order (hereinafter "Order") pursuant to Sections 116330 (f) and
21	116655 of th	ne California Health and Safety Code (hereinafter "CHSC") to Pueblo
22	Unido CDC (hereinafter PUCDC), owner of Saint Anthony Trailer Park Water System,
23	for violation	of the CHSC Section 116555(a)(1) and Title 22, California Code of
24	Regulations	(hereinafter "CCR"), Section 64431.
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Table 64431-A
Maximum Contaminant Levels
Inorganic Chemicals

morganic Chemicais				
Chemical	Maximum Contaminant Level, mg/L			
Aluminum	1.			
Antimony	0.006			
Arsenic	0.010			
Asbestos	7 MFL*			
Barium	1.			
Beryllium	0.004			
Cadmium	0.005			
Chromium	0.05			
Cyanide	0.15			
Fluoride	2.0			
Nitrate	0.010			
Mercury	0.002			
Nickel	0.1			
Nitrate (as nitrogen)	10.			
Nitrate+Nitrite (sum as nitrogen)	10.			
Nitrite (as nitrogen)	1.			
Perchlorate	0.006			
Selenium	0.05			
Thallium	0.002			

^{*} MFL=million fibers per liter; MCL for fibers exceeding 10 um in length.

CCR Title 22, Section 64432, states in relevant part:

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- (g) If the level of any inorganic chemical, except for nitrate, nitrate plus nitrite, or perchlorate, exceeds the MCL, the water supplier shall do one of the following:
 - (1) Inform the Department within 48 hours and monitor quarterly beginning in the next quarter after the exceedance occurred; or
 - (2) Inform the Department within seven days from the receipt of the analysis and, as confirmation, collect one additional sample within 14 days from



receipt of the analysis. If the average of the two samples collected exceeds the MCL, this information shall be reported to the Department within 48 hours and the water supplier shall monitor quarterly beginning in the next quarter after the exceedance occurred.

- (h) If the concentration of an inorganic chemical exceeds ten times the MCL, within 48 hours of receipt of the result the water supplier shall notify the Department and resample as confirmation. The water supplier shall notify the Department of the result(s) of the confirmation sample(s) within 24 hours of receipt of the confirmation result(s).
 - (1) If the average concentration of the original and confirmation sample(s) is less than or equal to ten times the MCL, the water supplier shall monitor quarterly beginning in the quarter following the quarter in which the exceedance occurred.
 - (2) If the average concentration of the original and confirmation sample(s) exceeds ten times the MCL, the water supplier shall, if directed by the Department;
 - (A) Immediately discontinue use of the contaminated water source; and
 - (B) Not return the source to service without written approval from the Department.
- (i) Compliance with the MCLs shall be determined by a running annual average; if any one sample would cause the annual average to exceed the MCL, the system is immediately in violation. If a system takes more than one sample in a quarter, the average of all the results for that quarter shall be used when calculating the running

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1	annual average. If a system fails to complete four consecutive quarters of monitoring,
2	the running annual average shall be based on an average of the available data.
3	
4	STATEMENT OF FACTS
5	Saint Anthony Trailer Park water system is located in Riverside County along
6	Highway 111, in the unincorporated town of Mecca. The owner of Saint Anthony
7	Trailer Park water system is PUCDC.
8	
9	Saint Anthony Trailer Park water system is classified as a community water system
10	that serves the residents of Saint Anthony Trailer Park. According to the 2017 Annual
11	Report to the Division and Division records, Saint Anthony Trailer Park water system
12	serves approximately 300 people through 95 service connections. All service
13	connections are un-metered. The water system obtains its water supply from one
14	active well located on Saint Anthony Trailer Park property.
15	
16	Title 22, CCR, Division 4, Chapter 15, Article 4, establishes primary drinking water
17	standards and monitoring and reporting requirements for inorganic constituents.
18	Community water systems must comply with the maximum contaminant level for
19	arsenic of 0.010 mg/L, as established in Title 22 CCR Section 64431.
20	
21	The arsenic results for Well #2 in 2013 was 0.016 mg/L. The Running Annual
22	Average (RAA) for arsenic in 2014 was 0.019 mg/L. The RAA for arsenic in 2015 was
23	0.021 mg/L. The RAA for arsenic in 2016 was 0.020 mg/L. The RAA for arsenic in

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2017 was 0.020 mg/L. The current RAA is 0.019 mg/L. The last four quarters results are listed below in Table 1:

Table 1: Arsenic Monitoring Results (in mg/L)

Sample Quarter	4 th	1st	2 nd	3 rd	Running
	Quarter	Quarter	Quarter	Quarter	Annual
	2017	2018	2018	2018	Average
Well #2	0.019	0.016	0.020	0.022	0.019

Bulk hauled water from an approved source was provided after the Citation and

Compliance Order dated March 3, 2010, was issued. An interim treatment station

was approved on June 9, 2010, to replace the bulk hauled water and was designed to

serve as a pilot study for centralized arsenic treatment.

On July 10, 2018, PUCDC submitted a letter to this Department requesting an extension to meet the Citation & Compliance Order No. 05_63_17R_003 and to request consolidation with Coachella Valley Water District (CVWD) in lieu of centralized treatment. On July 30, 2018, CVWD submitted a Development Review Letter to this Department indicating they have the capacity to provide domestic water service to Saint Anthony Trailer Park water system. On August 28, 2018, CVWD submitted a Technical Memorandum No. 2 to this Department regarding the East Coachella Valley Water Supply Project (ECVWSP). The Department understands that Saint Anthony Trailer Park water system is part of the ECVWSP. The ECVWSP evaluated and prioritized small water systems for potential consolidation with Coachella Valley Water District (CVWD). According to the memo, Saint Anthony

Trailer Park water system is the top ranked project for consolidation with CVWD for

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1	domestic water. CVWD is working with the State Water Resources Control Board
2	(SWRCB) for funding.
3	
4	<u>DETERMINATION</u>
5	CCR, Title 22, Section 64431, Monitoring Contaminant Levels – Inorganic Chemicals
6	states that public water systems shall comply with the primary MCLs established in
7	Table 64431-A. The MCL for arsenic is 0.010 mg/L.
8	
9	Based on the above Statement of Facts, the Department has determined that
10	Saint Anthony Trailer Park water system has failed to comply with primary drinking
11	water standards pursuant to CHSC, Section 116555(a)(1) and the arsenic MCL
12 13	pursuant to CCR, Title 22, Section 64431.
14	DIRECTIVES
15	To ensure that the water supplied by Saint Anthony Trailer Park water system is at al
16	times safe, wholesome, healthful, and potable, PUCDC is hereby directed to take the
17	following actions:
18 19	Permanently consolidate with Coachella Valley Water District (CVWD) for
20	water delivery service on or before December 31, 2022.
21	2. Until permanent consolidation with CVWD is completed:
22	A. The interim treatment station must continue to be operational and
23	accessible to the residents. Continue to sample the interim treatmen
24	station monthly for arsenic. Ensure that the analytical results are
25	reported to the Department by the analyzing laboratory no later thar

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the 10th day following the month in which the analysis was completed. All results must also be reported to the State Water Board electronically by the analyzing laboratory no later than the 10th day following the month in which the analysis was completed.

- B. Install and maintain approved point-of-use treatment units in each mobile home at the kitchen sink or another approved location. A pilot study of any proposed point-of-use treatment unit shall be required to confirm treatment efficiency, performance and treatment capacity. Each mobile home resident must be provided information regarding how the point-of-use treatment unit works and contact information for PUCDC should the resident have additional questions or encounter problems. Each point-of-use treatment unit must be sampled for arsenic annually. Submit results to this Department. Corrective actions must be taken on the device if confirmed samples indicate treated water that is greater than the MCL. Notify and consult with this Department within 48 hours if more than one device have initial sample results exceeding the MCL in any given month as this may indicate an unforeseen, system wide, problem with the installed POU devices.
- C. Continue to collect quarterly samples for arsenic from Well #2, as required by Section 64432(g), and ensure that the analytical results are reported to the Department by the analyzing laboratory no later than the 10th day following the month in which the analysis was



completed. All results must also be reported to the State Water Board electronically by the analyzing laboratory no later than the 10th day following the month in which the analysis was completed.

- D. Continue to notify all residents quarterly, in accordance with Enclosure No. 1, of Saint Anthony Trailer Park water system's failure to meet the arsenic MCL during any calendar quarter that the RAA exceeds the MCL. The notification must include the health risk in drinking water that exceeds the drinking water standard and that the only water with acceptable levels of arsenic is treated water from the interim treatment station or the treated water from a properly installed and maintained point-of-use treatment unit.
- E. Continue to submit proof of each public notification conducted in compliance with **Directive No. 3 (D)**, herein above, within 10 days following each such notification, using the form provided as **Enclosure No. 2**.
- F. Continue to notify residents of the arsenic violation on the annual Consumer Confidence Report.
- 3. On or before December 14, 2018, submit a written response to the Department indicating its agreement to comply with the directives of this Order and with the Corrective Action Plan addressed herein. The Corrective Action Plan shall include the time necessary to install point-of-use treatment units in each mobile home and a date when the water system will be in compliance with the arsenic MCL.



upon issuance.

Nothing in this Order relieves PUCDC of its obligation to meet the requirements of the
California SDWA, or any regulation, standard, permit or Order issued thereunder.

PARTIES BOUND

This Order shall apply to and be binding upon PUCDC and its owners, shareholders, officers, directors, agents, employees, contractors, successors, and assignees for Saint Anthony Trailer Park water system.

SEVERABILITY

The Directives of this Order are severable, and PUCDC shall comply with each and every provision hereof, notwithstanding the effectiveness of any other provision.

FURTHER ENFORCEMENT ACTION

The California SDWA authorizes the Department to: issue a Citation with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA (CHSC, Division 104, Part 12, Chapter 4, commencing with Section 116270) or any regulation, permit, standard, Citation, or Order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a Citation or Compliance Order. The California SDWA also authorizes the Department to take action to suspend or revoke a permit that has been issued to a public water system if the public water system has violated applicable law or regulations or has failed to comply with an Order of the Department; and to petition the superior court to take various enforcement measures against a public water

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1	system that has failed to comply with an Order of the Department. The Department
2	does not waive any further enforcement action by issuance of this Order.
3 4 5 6 7 8 9 10	Mark Abbott, REHS Mark Abbott, REHS Supervising Environmental Health Specialist Department of Environmental Health Riverside County
12	Certified Mail No. 7007 3020 0001 6550 3313
13 14 15	Enclosures: (1) Public Notification Template w/ Instructions (2) Proof of Public Notification Form (3) Quarterly Progress Report

Instructions for Tier 2 Arsenic MCL Notice Template

Template Attached

Since exceeding the arsenic maximum contaminant level (MCL) is a Tier 2 violation, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [California Code of Regulations Title 22, Chapter 15, Section 64463.4(b)]. Each water system required to give public notice must submit the notice to the State Water Resources Control Board, Division of Drinking Water (DDW) for approval prior to distribution or posting, unless otherwise directed by the DDW [64463(b)].

Notification Methods

You must use the methods summarized in the table below to deliver the notice to consumers. If you mail, post, or hand deliver, print your notice on letterhead, if available.

If You Are a	You Must Notify Consumers by	and By One or More of the Following Methods to Reach Persons Not Likely to be Reached by the Previous Method				
Community	Mail or direct delivery (a)	Publication in a local newspaper				
Water System [64463.4(c)(1)]		Posting in conspicuous public places served by the water system or on the Internet (b)				
S		Delivery to community organizations				
Non-Community Water System	Posting in conspicuous locations throughout the	Publication in a local newspaper or newsletter distributed to customers				
[64463.4(c)(2)]	area served by the water system (b)	Email message to employees or students				
		Posting on the Internet or intranet (b)				
		Direct delivery to each customer				

⁽a) Notice must be distributed to each customer receiving a bill including those that provide their drinking water to others (e.g., schools or school systems, apartment building owners, or large private employers), and other service connections to which water is delivered by the water system.

The notice attached is appropriate for the methods described above. However, you may wish to modify it before using it for posting. If you do, you must still include all the required elements and leave the health effects and notification language in italics unchanged. This language is mandatory [64465].

Multilingual Requirement

The notice must (1) be provided in English, Spanish, and the language spoken by any non-English-speaking group exceeding 10 percent of the persons served by the water

⁽b) Notice must be posted in place for as long as the violation or occurrence continues, but in no case less than seven days.

system and (2) include a telephone number or address where such individuals may contact the water system for assistance.

If any non-English-speaking group exceeds 1,000 persons served by the water system, but does not exceed 10 percent served, the notice must (1) include information in the appropriate language(s) regarding the importance of the notice and (2) contain the telephone number or address where such individuals may contact the water system to obtain a translated copy of the notice from the water system or assistance in the appropriate language.

Population Served

Make sure it is clear who is served by your water system -- you may need to list the areas you serve.

Corrective Action

In your notice, describe corrective actions you are taking. Do not use overly technical terminology when describing treatment methods. Listed below are some steps commonly taken by water systems with chemical or radiological violations. Use one or more of the following actions, if appropriate, or develop your own:

- "We are working with [local/state agency] to evaluate the water supply and researching options to correct the problem. These options may include treating the water to remove arsenic or connecting to [system]'s water supply."
- "We have stopped using the contaminated well. We have increased pumping from other wells, and we are investigating drilling a new well."
- "We will increase the frequency at which we test the water for arsenic."
- "We have since taken samples at this location and had them tested. They show that we meet the standards."

After Issuing the Notice

Send a copy of each type of notice and a certification that you have met all the public notice requirements to the DDW within ten days after you issue the notice [64469(d)]. You should also issue a follow-up notice in addition to meeting any repeat notice requirements the DDW sets.

It is recommended that you notify health professionals in the area of the violation. People may call their doctors with questions about how the violation may affect their health, and the doctors should have the information they need to respond appropriately.

It is a good idea to issue a "problem corrected" notice when the violation is resolved.

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Este informe contiene información muy importante sobre su agua potable. Tradúzcalo o hable con alguien que lo entienda bien.

[System] Has Levels of Arsenic Above the Drinking Water Standard

Our water system recently violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what you should do, what happened, and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Water sample results received on [date] showed arsenic levels of [level and units]. This is above the standard, or maximum contaminant level (MCL), of 0.010 milligrams per liter.

What should I do?

- You do not need to use an alternative water supply (e.g., bottled water).
- This is not an emergency. If it had been, you would have been notified immediately. However, some people who drink water containing arsenic in excess of the MCL over many years may experience skin damage or circulatory system problems, and may have an increased risk to getting cancer.
- If you have other health issues concerning the consumption of this water, you may wish to consult your doctor.

What happened? What is being done?

[Describe corrective action]. We anticipate resolving the problem within [estimated time frame].

For more information, please contact [name of contact] at [phone number] or [mailing address].

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this public notice in a public place or distributing copies by hand or mail.

Secondary Notification Requirements

Upon receipt of notification from a person operating a public water system, the following notification must be given within 10 days [Health and Safety Code Section 116450(g)]:

- SCHOOLS: Must notify school employees, students, and parents (if the students are minors).
- RESIDENTIAL RENTAL PROPERTY OWNERS OR MANAGERS (including nursing homes and care facilities): Must notify tenants.
- BUSINESS PROPERTY OWNERS, MANAGERS, OR OPERATORS: Must notify employees of businesses located on the property.

This notice is being sent to you by [system].					
State Water System ID#:	Date distributed:				

INFORMACIÓN IMPORTANTE SOBRE SU AGUA POTABLE

Este aviso contiene información muy importante sobre su agua potable.

El agua de [System] tiene altos niveles de Arsénico que exceden el estándar para agua potable

Nuestro sistema de agua recientemente violó un estándar para agua potable. Aunque esto no es una emergencia, como cliente nuestro, usted tiene el derecho de saber qué debería hacer, lo que pasó, y qué estamos haciendo para corregir ésta situación.

Nosotros rutinariamente hacemos monitoreo para detectar la presencia de contaminantes en el agua potable. Los resultados de pruebas de muestras que recibimos el [date] indicaron niveles de [level and units]. Estos niveles exceden el estándar o MCL (nivel máximo de contaminantes) de 0.010 milígramos por litro (mg/L).

¿Qué debo hacer?

- Usted no tiene que usar un suministro de agua alternativo (por ejemplo, agua embotellada).
- Esto no es una emergencia. Si esto hubiera sido una emergencia, se le hubiera notificado de inmediato. No obstante, algunas personas que beben agua que contiene arsénico arriba del nivel máximo de contaminantes (MCL) a lo largo de muchos años, pueden experimentar daños a la piel o problemas del sistema circulatorio, y pueden tener un riesgo mayor de tener cáncer.
- Si tiene otros problemas de salud respecto al consumo de ésta agua, usted debería consultar con su doctor.

¿Qué sucedió? ¿Qué se está haciendo al respecto?

[Describe corrective action]. Anticipamos resolver el problema dentro de [estimated time frame].

Para más información, por favor contacte a [name of contact] al [phone number] o [mailing address].

Por favor comparta esta información con todas las demás personas que tomen de esta agua, especialmente aquellos que no hayan recibido éste aviso directamente (por ejemplo, las personas en apartamentos, asilos, escuelas, y negocios). Puede hacerlo poniendo este aviso en un lugar público o distribuyendo copias en persona o por correo.

Requisitos de Notificación Secundaria

Al recibir la notificación de alguien que opere un sistema de agua público, se debe dar la siguiente notificación dentro de 10 días conforme a la Sección 116450(g) del Código de Salud y Seguridad:

- ESCUELAS: Deben notificar a los empleados de la escuela, estudiantes, y a los padres (si los estudiantes son menores).
- DUEÑOS O GERENTES DE PROPIEDAD PARA ALQUILER RESIDENCIAL (incluyendo asilos e instituciones de cuidado): Deben notificar a sus inquilinos.
- DUEÑOS DE PROPIEDAD DE NEGOCIOS, GERENTES, U OPERADORES: Deben notificar a los empleados de los negocios situados en la propiedad.

Este aviso es enviado por [system].	
Núm. de Identificación del Sistema Estatal de Agua:	
Fecha de distribución:	

CERTIFICATION OF COMPLETION OF PUBLIC NOTIFICATION

Compliance Order Number: 05_63_18R_004

Name of Water System: Saint Anthony Trailer Park

System Number: 3301380

Attach a copy of the public notice distributed to the water system's customers.

This form, when completed and sent to the Riverside County Department of Environmental Health, serves as certification that public notification to water users was completed as required by Title 22, California Code of Regulations, Sections 64463-64465.

Publi	c notifica	ion for failure to comply with the <u>Arsenic MCL</u> was condu	ucted on:	
Notif	ication wa	s made on		(date).
For t	he month	, year of,,		
		report delivery used and good-faith efforts taken, please where appropriate:	check all item	s below that
For C	Communit	y and non-transient non-community public water systems		
ПТ	ne notice	was distributed by mail or direct delivery to each custome	r on:	
maili	ng or dire	f the following methods were used to reach persons not lict delivery or persons served by a transient public water s prison inmates, etc.):		
	Posted the notice at the following conspicuous locations served by the water system. (If needed, please attach a list of locations).			
		on of the notice in a local newspaper or newsletter of gene blished notice, including name of newspaper and date pu		n (attach a copy
	Posted t	ne notice on the Internet at www		
	Other me	ethod used to notify customers.		
l here	eby certify	that the above information is factual.		
Certi	fied by:	Printed NameTi	tle	
		Signature		
		Date		

Disclosure: Be advised that the California Health and Safety Code, Sections 116725 and 116730 state that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the Safe Drinking Water Act may be liable for, respectively, a civil penalty not to exceed five thousand dollars (\$5,000) for each separate violation or, for continuing violations, for each day that violation continues, or be punished by a fine of not more than \$25,000 for each day of violation, or by imprisonment in the county jail not to exceed one year, or by both the fine and imprisonment.

QUARTERLY PROGRESS REPORT

Water System: Saint Anthony T	railer Park	Water Syster	m No: 3301380
Compliance Order No: 05_63_1	8R_004	Violation:	Arsenic MCL
Calendar Quarter:		Date:	
This form should be prepared at authority to implement the direction Please attach additional sheets as by the 10th day of each sub Environmental Health at 47-950 plajones@rivco.org Summary of Compliance Plan:	ves of the Compliar s necessary. The quester, to sequent quarter, to	nce Order and uarterly progre o the Rivers	the Corrective Action Planess report must be submitted ide County Department o
,			
Tasks completed in the reportir	ng quarter:		
Tasks remaining to complete:			
Anticipated compliance date:			
consequence Productions of the Conference of the			
Printed Name	Sign	ature	
Title	Date)"	